



GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

6235

October 14, 2014

Scott Parsons
Staker Parsons Companies
89 West 13490 South, Suite 100
Draper, Utah 84020

Subject: Eighth Review of Notice of Intention to Commence Large Mining Operations, Staker Parsons Companies, Beef Hollow Facility, M/035/0042, Salt Lake County, Utah

Dear Mr. Parsons:

The Division of Oil, Gas and Mining has reviewed the referenced Notice of Intention to Commence Large Mining Operations (NOI) for the Beef Hollow Facility, which was received September 17, 2014. The attached comments will need to be addressed before tentative approval may be granted.

Please respond to these comments by December 15, 2014.

Please contact Leslie Heppler at 801-538-5257 or me at 801-538-5261 if you have any questions about the review. Thank you for your cooperation in completing this permitting action.

Sincerely,

Paul B. Baker
Minerals Program Manager

PBB: lah: eb

Attachment: Review

cc City of Herriman

P:\GROUPS\MINERALS\WP\M035-SaltLake\M0350042-BeefHollowFacility\final\REV8-6235-10072014.doc



**EIGHTH REVIEW OF NOTICE OF INTENTION
TO COMMENCE LARGE MINING OPERATIONS**

**Staker Parsons Company
Beef Hollow Mine
M/035/0042
October 14, 2014**

General Comments:

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
1	General	(No response needed.) The Division may have additional comments based on submittals received in the future.	lah	
2	General	Please submit good quality color copies on the final revision. The Division needs color pages for the photos and maps in Appendices A, D, and F.	lah	
3	Appendix H	Red line and strikeout will not be needed in the final document.	lah	
4	Appendix	A vegetation survey is now in Appendix D, but the text on page 17 refers to Appendix F. Please make appropriate changes, and include the proper reference in the table of contents.	lah	

R647-4-105 - Maps, Drawings & Photographs

General Map Comments

105.3 - Drawings or Cross Sections (slopes, roads, pads, etc.)

5	Figure 8	<p>From the October 16, 2013, review:</p> <p>Original Comment: Any springs or other hydrology features within 500 ft of the permit boundary should be identified on this map. Make a negative declaration on this map if there are none.</p> <p>Follow-Up Comment: Please identify the following on Figure 8:</p> <ul style="list-style-type: none"> - the locations and ownership of the culverts under the highway, - any ditches adjacent to the highway, - berms and ditches such as those shown along the road in the SWPPP, mining, and permit boundaries in the outdated SWPPP, - berms and ditches at permit boundaries, like those shown in the SWPPP (Section 109.4 states that stormwater flowing onto the site will be channeled to existing drainages), - the roads within the permit boundaries, - the locations of fuel storage and other potentially deleterious materials, - the Jordan Valley Water Treatment Plant, and - the canal just below the treatment plant. <p>9/29/14 Comment: This comment has not been addressed.</p>	pnb	
6	Figure 8	<p>From the October 16, 2013, review:</p> <p>Original Comment: Without seeing the calculations and more detail, it appears that the sediment basin for the largest stream channel (originating on the Camp Williams property) may be smaller than it should be, when compared to the other sediment basins and the watershed sizes. Determine whether this is the case and correct the map accordingly.</p> <p>Follow-Up Comment: Based on the actual area for Basin 6, the calculated capacity for Pond 15 still appears to be inadequate. See next comment.</p> <p>9/29/14 Comment: This comment has not been addressed.</p>	pnb	
7	Figure 8	<p>From the October 16, 2013, review:</p> <p>New Comment: Provide a topo map of the site to include the entire Contributing Area of Basin 6, which extends south and west of the current boundary. Identify the boundaries of all the contributing areas.</p> <p>9/29/14 Comment: This comment has not been addressed.</p>	pnb	

8	Figure 8	<p>From the October 16, 2013, review:</p> <p>Original Comment: The watershed boundary on the map for watershed 6 (Existing Drainage Basin 6)—which appears to include parts but not all of the watershed associated with the drainage from Camp Williams—doesn't match the acreage included in the table on the map. The Basin 6 watershed should be identified correctly. Feel free to call the Division to discuss. If values and coverage for the contributing area change as a result, calculations will need to be updated.</p> <p>Follow-Up Comment: The Contributing Area of Basin 6 should be significantly larger than reported on Figure 8, since the drainage extends miles offsite to the southeast on Camp Williams land. Also, the Basin 4 and 5 Contributing Areas should extend up the drainage past the proposed permit boundary, since the drainage area doesn't stop at the permit boundary. Stormwater design flows will need to be re-calculated using the revised contributing areas. Re-design the sediment basins, culverts, and other water diversion structures to consider the actual drainage basin areas. See comment regarding design storms below. The footprint of sediment basins on the map should be consistent with their volumes.</p> <p>9/29/14 Comment: This comment has not been addressed.</p>	pnb	
9	Figure 8	<p>From the October 16, 2013, review:</p> <p>New Comment: The following hydrologic design information should be reported:</p> <ul style="list-style-type: none"> - Provide a design flow for Basin 6. - Identify Culvert H. - Include the pond depth in the Drainage Basin Sediment Pond table. <p>9/29/14 Comment: This comment has not been addressed.</p>	pnb	
10	Figure 9	<p>From the October 16, 2013, review:</p> <p>Original Comment: The final contours map (Figure 9) identifies the road along the south boundary as remaining after reclamation. Until an agreement has been reached regarding existing roads at the site, road reclamation will need to be included in the reclamation bond.</p> <p>Follow-Up Comment: Any post-reclamation road should be clearly identified. The culvert size should be consistent with the Basin 6 design flow. If this culvert size is the same as the size of the culvert beneath the Mountain View Corridor highway, then the Division will accept it as being appropriate after reclamation. See Section 110.3. If this road is to be reclaimed, the original comment will need to be addressed in the reclamation cost calculations.</p> <p>9/29/14 Comment: This comment has not been addressed.</p>	pnb	

11	Figure 9 (should be Figure 8)	<p>Original Comment: Please provide the calculations and assumptions for the drainage basin statistics and the design flows shown on Figure 9.</p> <p>Follow-Up Comment: The use of a 10-year, 60-minute design storm is not consistent with the statement in Section 106.9 that the 10-year, 24-hour storm will be used to size the storm water retention ponds. The Division requests that temporary water retention structures be designed to at very least the 10-year, 24-hour storm event for this site, and recommends that structures be designed for larger storm event. The Division also recommends that any permanent water retention structures that will remain after reclamation be designed for at least a 100-year, 24-hour storm event, and with a suitable outflow design.</p> <p>9/29/2014 comment: the reference to storm size (10-year, 24-hour) has been removed. The Division still recommends the items in the previous review though these are recommendations and not requirements.</p>	pnb	
----	----------------------------------	---	-----	--

R647-4-109 - Impact Assessment

109.3 – Soils

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
12	Pg 26	The text says “Highwalls will be left no greater than 3H:1V” and final slopes not to exceed “3H:1,” but the cross sections on Figure 10,11 and 12 show 2H:1V slopes. Please correct this apparent discrepancy.	lah	

R647-4-110 - Reclamation Plan

110.2 - Roads, highwalls, slopes, drainages, pits, etc., reclaimed

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
13	Page 26	New Comment: Please correct Section 110.2 to indicate that silt fences and other water control structures will be removed after reclamation and once they are no longer needed. Permanent features (that will be retained after reclamation) should be specifically identified and discussed in section 110.3 (such as the road fill and culvert G, which will need to be hydrologically sound).	pnb	

110.3 - Description of facilities to be left (post mining use)

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action

Seventh Review
Page 6 of 6
M/035/0042
October 14, 2014

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
14	Page 26	<p>New Comment: Rule R647-4-111.2 requires that channels be left in a stable condition with respect to actual and reasonably expected water flow so as to avoid or minimize future damage to the hydrologic system. In addition to the commitment to backfill and blend ponds into surrounding topography, state that channels will be left in a stable condition with respect to actual and reasonably expected water flow.</p> <p>9/29/14 Comment: The Division has determined no response is needed for this comment.</p>	pnb	

113 – Surety

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
15	Appendix G page1	The reclamation cost estimate summary sheet indicates the costs used were from 2012, but these costs are from 2014. This summary sheet also indicates the area bonded is 589 acres, but Figure 7 notes 410 acres for phase 1. Please make appropriate corrections and add the escalation year of 2019.	lah	